

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GHEEVARCHESE A. THANKACHAN,

Docket No.: 07-CV-8332
(PED)

Plaintiff,

NOTICE OF MOTION

-against-

PEEKSKILL HOUSING AUTHORITY, JOHN
TESTA, MAYOR, CITY OF PEEKSKILL,
LEESTHER BROWN, ERIC HINES, SANDRA
BOND, LORRAINE ROBINSON, sued in their
official and individual capacities,

Defendants.

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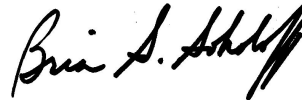
PLEASE TAKE NOTICE that, upon the Declaration of Adam I. Kleinberg with exhibits, the accompanying Memorandum of Law, and upon all pleadings and proceedings heretofore had herein, defendants Peekskill Housing Authority and Leesther Brown will move this Court before the Honorable Paul E. Davison at the United States District Court for the Southern District of New York, located at 300 Quarropas Street, White Plains, New York, on a date and time set by the Court, for an Order pursuant to Fed. R. Civ. P. 62(b) and 62 (d) granting defendants:

- 1) a bondless stay of the execution of judgment pending a decision on defendants' post-trial motion to this Court;
- 2) a bondless stay of the execution of judgment pending a decision on defendants' appeal to the U.S. Court of Appeals for the Second Circuit; and

- 3) such other and further relief as this Court deems just, equitable and proper.

Dated: Westbury, New York
December 19, 2011

SOKOLOFF STERN LLP



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Adam I. Kleinberg
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Our File No. 080109

TO: All counsel of record (via ECF)